

# Fact Sheet



## For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-01100007-2013**

Application Received: **May 1, 2013**

Plant Identification Number: **011-00007**

Permittee: **Huntington Alloys Corporation**

Mailing Address: **3200 Riverside Drive, Huntington, WV 25705**

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Physical Location: Huntington, Cabell County, West Virginia  
UTM Coordinates: 379.2 km Easting • 4252.30 km Northing • Zone 17  
Directions: Interstate 64W to 29th Street Exit, go towards Huntington on Route 60 to the Washington Blvd intersection. Make a right and go across Washington Blvd bridge. Right turn on Riverside Drive. Enter plant through Main Gate.

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### Facility Description

Huntington Alloys Corporation is a large rolling mill devoted exclusively to the production of wrought nickel and high nickel alloy products. This facility produces ingots, slabs, plate, sheet, strip, billets, rods, wire, pipe and tubing in approximately 120 different alloys. It incorporates some two hundred manufacturing operations which include: melting and remelting of metals to produce alloy ingots, hot and cold rolling, forging, drawing, machining, grinding, shot blasting, pickling, annealing, and ancillary testing and by-product recovery operations.

### Emissions Summary

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Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2012 Actual Emissions
Carbon Monoxide (CO)	177.23	104.7
Nitrogen Oxides (NO <sub>x</sub> )	630.55	120.1
Particulate Matter (PM <sub>2.5</sub> )	1092.56	38.5
Particulate Matter (PM <sub>10</sub> )	1092.56	40.9

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Regulated Pollutants	Potential Emissions	2012 Actual Emissions
Total Particulate Matter (TSP)	1277	40.9
Sulfur Dioxide (SO <sub>2</sub> )	4.18	1.62
Volatile Organic Compounds (VOC)	53.5	13.7

*PM<sub>10</sub> is a component of TSP.*

Hazardous Air Pollutants	Potential Emissions	2012 Actual Emissions
Nickel	190.78	5.62
Chromium	56.01	1.62
Hydrochloric Acid	20	1.78
Hexane	5.8	1.65

*Some of the above HAPs may be counted as PM or VOCs.*

This facility has the potential to emit equal to or greater than 100,000 tons per year of carbon dioxide equivalent (CO<sub>2</sub>e) and 100 tons per year of greenhouse gases (GHGs) on a mass basis.

### Title V Program Applicability Basis

This facility has the potential to emit 177.23 tons per year of CO, 630.55 tons per year of NO<sub>x</sub>, 1092.56 tons per year of PM<sub>10</sub>, 190.78 tons per year of nickel, 56 tons per year of chromium, and 20 tons per year of hydrochloric acid. Due to this facility's potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of a single HAP, over 25 tons per year of aggregate HAPs, and over 100,000 tons per year of carbon dioxide equivalent and 100 tons per year of greenhouse gases on a mass basis, Huntington Alloys Corporation is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

### Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	PM limits on boilers.
	45CSR6	Open burning prohibited.
	45CSR7	PM limits on manufacturing processes.
	45CSR10	SO <sub>2</sub> limits.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	NSR Permits.
	45CSR21	VOC limits for degreasers.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	HAP Emission Standards for Part 63 Sources
	40 CFR Part 61	Asbestos inspection and removal
	40 CFR Part 63, Subpart N	Chromium Electroplating MACT
	40 CFR Part 64	Compliance Assurance Monitoring
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances

State Only: 45CSR4 No objectionable odors.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

#### Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-0137	March 24, 1975	
R13-1165	November 3, 1989	
R13-1646	December 1, 1993	
R13-1767	October 17, 1994	
R13-2163A	December 20, 2010	
R13-2532D	April 13, 2011	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

#### Determinations and Justifications

This is a second renewal of the Title V Permit. The following changes have occurred since the most recent Title V permit was issued:

##### **Title V Boilerplate changes:**

Condition 3.1.3. citation was changed because 45CSR15 was repealed and 40 CFR 61 is now incorporated into 45CSR34.

Condition 3.3.1.d. was added.

Conditions 3.5.3. and 3.5.5. were revised to address electronic submittal of the annual certification to the USEPA. The certification shall now only be submitted to the USEPA by e-mail.

##### **Other changes:**

##### **Section 1.1 – Emission Unit Table**

Added the following sources that are named in the source specific requirement sections, but were not included in the Emissions Unit Table: Plate Anneal Furnace (PM-23-P), Salem Tip-up Furnace (MA-4-P), East Cutters (CD-17-P), and Cold Solvent Degreasers.

Revised the following Control Device Descriptions:

- #1 Primary Rolling Mill (PM-1 & 2-P): revised Blower PM-1 & 2C to “None” because a blower is not considered a control device.
- Plasma Cutting Torch (PM-3-P): revised Blower PM-3-C to “None” because a blower is not considered a control device.
- Northcentral and Northwest Grinder (PM-26-P and PM-8-P): revised Baghouse PM-8 & 26-C to “Baghouses PM-8A-C, PM-8B-C, and PM-26-C”. Baghouse PM-8 was renamed Baghouse PM-8A-C, and Baghouse PM-8B-C was added to collect titanium dust.
- Abrasive Cut-off Machine (BW-11-P): added “Baghouse BH-11-C”.
- Hard Chrome Plating (CD-36-P): added Scrubber ID “CD-36-C”.
- Finish Saw (SC-2-P): added “Scrubber” to SC-2-C

Sections 4.0 through 14.0 - Revised the headings in each Section to remove equipment names and use only Emission Unit IDs to be consistent with other permits. Also made the following corrections:

- Section 5.0 – Direct Fired Furnaces: added CAP Equalize Furnace (SM-7-P) and VIM Mold Preheat (VM-2-P)
- Section 6.0 – Hot Working Operations: added Wire Feeder (MS-1E-P); combined PM emission limit with Argon Oxygen Reactor since they share stacks.
- Section 7.0 – Cold Working Operations: added Rod Cell Saw (CD-39-P), also added to PM emission limit table.
- Section 9.0 – Process Tanks: added Wet Pickle Tanks #11 (CD-38-P); removed Bar and Wire Quench Tanks (BW-4A-P and BW-4B-P) as these sources have been removed.

Conditions 6.2.2. and 6.4.2. citations were revised to include 45CSR§10-8.2.c.

Conditions 6.2.5 through 6.2.9., 6.5.1.c., 7.2.6. through 7.2.10., and 7.5.1.c. were added to incorporate CAM boilerplate requirements.

Conditions 9.1.4. and 9.5.1. were deleted because the Bar and Wire Quench Tanks were removed.

Condition 14.1.8. was revised by renaming the Water Wash burner to Wash Water burner to correct a typo.

Condition 14.1.9. was revised by renaming the Rinse Wash burner to Rinse Water burner to correct a typo.

Old permit Conditions 14.1.17. and 14.1.20. were removed since the requirements for quarterly opacity checks were redundant with the quarterly opacity checks required in Condition 14.3.1. The citations for Permit R13-2532, Conditions 5.1.17. and 5.1.20. were added to Condition 14.3.1. of the Title V permit.

Conditions 14.1.21., 14.4.4., and 14.4.5. referred to air pollution control equipment listed in Section 1.0., however the requirements apply only to equipment listed in Permit R13-2532, therefore the reference was changed to control equipment listed in Section 14.1.3. to be more accurate.

**40 CFR Part 63, Subpart DDDDD (Boiler MACT) Requirements** - Huntington Alloys Corporation has submitted a Notification that the indirect fired fuel-burning units B-1-P, B-4-P, SM-5-P, and CD-32-P may be subject to the MACT.

These sources must comply with the MACT by January 31, 2016 in accordance with 40 CFR § 63.7495, unless an extension of compliance is granted. The Title V permit requires a submittal for a significant modification in accordance with the MACT rule. The 40 CFR part 63, subpart DDDDD placeholder language was added as Condition 4.1.8.

**40 CFR 64 - Compliance Assurance Monitoring (CAM)** - The facility currently has approved CAM plans from the 2008 renewal permit for #4 and #5 Electric Arc Furnaces (MS-1D and MS-1B), the Argon Oxygen Reactor (MS-1A), the Wire Feeder (MS-1E-P), the Powder Torch (MS-2), and the Cap Line Shot Blaster (SM-2-P). There are also approved CAM plans from the Significant Modification (SM03) for the Rotary Borings Kiln 1 Thermal Oxidizer (TP-7A-2C), and Rotary Borings Kiln 2 Thermal Oxidizer (TP-8A-2C). The added

equipment from the minor modification (MM01) did not require a CAM plan in accordance with 40 CFR §64.2(a)(3). Therefore, no changes were made to the CAM plans for this second renewal.

### **Non-Applicability Determinations**

The following requirements have been determined not to be applicable to the subject facility due to the following:

40CFR Part 60 subpart Dc - The Main Boiler and V.I.M. boiler were constructed before June 9, 1989 and have not been modified after that date. The CAP Salt Bath and West Pickle Salt Bath have capacities less than 10 mmBtu/hr.

40CFR Part 60 subpart K - There are no tanks storing petroleum liquids at the Huntington Alloys facility that were constructed between June 11, 1973 and May 19, 1978 and are greater than 151,412 liters (40,000 gallons).

40 CFR Part 60, Subpart Ka - Some of the petroleum liquid storage tanks exceed the 151,416 liters (40,000 gallons) threshold capacity but are not subject to the standards because the vapor pressures of the storage tanks are less than the 10.3 kilopascal trigger listed in 40 CFR § 60.112a(a) and the 6.9 kilopascal trigger listed in 40 CFR § 60.115a(d)(1).

40 CFR Part 60, Subpart Kb - Some of the tanks storing volatile organic liquids have a capacity greater than 75 m<sup>3</sup> and less than 151m<sup>3</sup>, but are not subject to the provisions of this subpart because the vapor pressures of the tanks are less than the 15 kilopascal trigger listed in 40 CFR§ 60.110b(b).

40 CFR Part 60, Subpart AAa - The #4 Electric Arc Furnace, #5 Electric Arc Furnace, and AOD vessel were installed in 1966, 1971, and 1971 respectively, before the applicability date of this regulation (October 21, 1974). Therefore, this regulation is not applicable to the facility.

40 CFR Part 63, Subpart CCC - HCl Pickling NESHAPS - This standard is not applicable to facilities that pickle specialty steel. Specialty steel means a category of steel that includes silicon electrical, alloy and stainless steels.

40 CFR Part 63, Subpart YYYYYY - This standard is applicable to area sources. Huntington Alloys is not an area source of HAPs.

**Greenhouse Gas Permitting** - This is a second renewal Title V permit. Since the first renewal, there have been three significant modifications and one minor modification, none of which triggered a PSD permit. Therefore, there are no applicable GHG requirements.

### **Request for Variances or Alternatives**

None.

### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

### **Comment Period**

Beginning Date: September 16, 2013

Ending Date: October 16, 2013

**Point of Contact**

All written comments should be addressed to the following individual and office:

Bobbie Scroggie  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57th Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1225 • Fax: 304/926-0478  
e-mail address: Bobbie.Scroggie@wv.gov

**Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

**Response to Comments (Statement of Basis)**

Not applicable.